CLOSURE SUMMARY REPORT FOR TANK T207

U S Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No CO7890010526

1 0 PURPOSE

This Summary Report pertains to closure activities for Tank T207 Tank 207 (T-29) was installed in 1952 and had not been used since the mid-1980's Tank 207 was part of the original process waste line (OPWL) system and part of the old Operable Unit 9 (Interim Status/Inter-Agency Agreement) The tank was used to store untreated waste from various buildings on-Site prior to treatment in B774 The wastes consisted of acids, bases, solvents, radionuclides, metals, chlorides, oils and greases In addition, treated waste would also be stored in Tank 207 prior to discharge to the Solar Ponds, if no other storage option was available This report contains a description of major closure activities and any deviations from those stated in the Closure Description Document (CDD) and other relevant information

2 0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities for Tank T207 were conducted under the Closure Description Document for RCRA Closure of Tank T207, approval date, February 26, 2002

Although the CDD initially indicated that the tank was thought to be empty of any residual material, upon opening of the manway located on the west side of the tank, it was discovered that the tank, in fact, contained a significant amount of dried "sludge " This material was sampled (RIN #s 02D1294 and MJP-152-2002) for RCRA characterization Although the data did not indicate hits for any analytes, waste codes F001, F002, F005, F006, F007, and F009 were applied to the "sludge", due to process knowledge of the solvent wastes that were routed into or through the tank, and the fact that the tank had never been clean closed under RCRA These codes are the same ones that were applied to the low-level mixed (LLM) waste streams, e g Surface Contaminated Object (SCO) mixed IDC (IDC 5001) and asbestos gasket waste, as well as to the (IDC 0299) transuranic-mixed (TRM) sludge Radiological data indicated that the activity level in the sludge was high enough to classify the material as a transuranic-mixed (TRM) waste stream The "sludge" was resampled per WIPP protocols, stabilized through the application of CCWet® fixative, bagged, and containerized in drums for eventual disposal

Upon removal of all "sludge" from the tank, the inside of the tank was surveyed for radiological purposes, and was classified as surface contaminated (SCO) waste The interior was then sprayed with CCFix® to control any potential for airborne beryllium that may have arisen during size reduction activities The tank was subsequently size reduced, packaged in intermodals, and shipped to Envirocare for disposal Sampling of metal from the tank showed that the tank would meet the criteria of an LDR compliant waste stream Personal Protective Equipment (PPE) associated with the closure activities were disposed of as LLM waste

Inspection of the tank floor prior to size reduction showed no evidence of loss of integrity, therefore soil sampling beneath the tank footprint was not deemed necessary Due to chipping of exterior paint during size reduction activities, a

2

limited quantity of soil/gravel was collected and disposed of as LLM waste with an associated D008 waste code

Waste volumes (cubic meters), by IDC/WFC are as follows

IDC 0438 (Asbestos gasket) – 21

IDC 0299 (TRM sludge) – 17 183

IDC 5001 (LLM) – 154 813

IDC 5001 (LLW) – 9 007

IDC 0863 (LLW) – 419

IDC 0825 (TRM) – 21

Sludge removal was conducted under work package number T0110687 D&D activities were conducted under work package number T0111420

3.0 SUMMARY

This Closure Summary Report will serve as notice to update the Site's Master List of RCRA units and submit a permit modification to remove the units from the Site RCRA Permit